

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
PAMELA DENISE JONJO,	:	
	:	CASE NO.: 24-11139-pmm
Debtor.	:	
	:	
Village Capital & Investment, LLC and all	:	
parties listed on the mailing matrix filed	:	
with the Clerk,	:	
	:	
Respondents.	:	

MOTION TO EXTEND AUTOMATIC STAY

AND NOW COMES Debtor, Pamela Denise Jonjo, by and through her undersigned attorneys, with this Motion to Extend Automatic Stay pursuant to Section 362(c)(3)(B), and in support thereof avers as follows:

1. Debtor filed the above-captioned bankruptcy case on April 4, 2024.
2. Previously, Debtor filed a Chapter 13 bankruptcy case on November 17, 2021, docketed at 21-13083-PMM (the "Prior Case").
3. On January 25, 2024, the Prior Case was dismissed due to a failure to make plan payments.
4. Other than the Prior Case, Debtor has had no other pending bankruptcy cases over the last twelve (12) months.
5. Both the above-captioned case and the Prior Case were filed for the primary purpose of curing mortgage arrears.
6. In the Prior Case, a family member who resided in Debtor's home and contributed to the household income passed away.
7. This caused the Debtor to fall behind on Trustee payments.

8. The monthly net income in the current case is \$920.63 whereas it was \$401.36 in the Prior Case.
9. This is due to increases in Debtor's Social Security income, Debtor's sons' Social Security Income, and Debtor's boyfriend's income.
10. Debtor requests an extension of the automatic stay as to the Respondent and all creditors.
11. Based on the above factual allegations, it is submitted there is clear and convincing evidence that the instant bankruptcy petition has been filed in good faith and for cause.
12. Debtor requires the extension of the automatic stay to protect the Debtor from collection efforts against her property.

WHEREFORE, Debtor, Pamela Denise Jonjo, respectfully prays this Honorable Court for an ORDER that Grants this Motion to Extend Automatic Stay, and extends the automatic stay beyond thirty (30) days from the filing date, and until such time as the above-captioned case is dismissed, discharged, or this Court enters an Order modifying the stay, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,

NEWMAN WILLIAMS, P.C.

Dated: April 5, 2024

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